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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	Case No. CR 18-577 CRB
	)	
Plaintiff,	)	UNITED STATES' PROPOSED
	)	VERDICT FORM
v.	)	
	)	Trial Date: March 18, 2024
MICHAEL RICHARD LYNCH AND	)	Pretrial Conference: February 21, 2024
STEPHEN KEITH CHAMBERLAIN,	)	
	)	
Defendants.	)	

The government respectfully submits its Proposed Verdict Form.

DATED: February 16, 2024

Respectfully submitted,

PATRICK D. ROBBINS  
Attorney for the United States, Acting Under  
Authority Conferred by 28 U.S.C. § 515

*Robert S. Leach*

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ADAM A. REEVES  
KRISTINA GREEN  
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Assistant United States Attorneys

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	Case No. CR 18-577 CRB
Plaintiff,	)	VERDICT FORM
v.	)	
MICHAEL RICHARD LYNCH AND	)	
STEPHEN KEITH CHAMBERLAIN,	)	
Defendants.	)	

**COUNT ONE: 18 U.S.C. § 1349 (Conspiracy to Commit Wire Fraud)**

We, the jury in the above-entitled case, unanimously find the defendant listed below:

	GUILTY	NOT GUILTY
--	--------	------------

MICHAEL RICHARD LYNCH	_____	_____
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STEPHEN KEITH CHAMBERLAIN	_____	_____
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of the charge of Conspiracy to Commit Wire Fraud, as set forth in Count One of the Indictment.

**COUNT TWO: 18 U.S.C. § 1343 (Wire Fraud)**

We, the jury in the above-entitled case, unanimously find the defendant listed below:

	GUILTY	NOT GUILTY
--	--------	------------

MICHAEL RICHARD LYNCH	_____	_____
-----------------------	-------	-------

STEPHEN KEITH CHAMBERLAIN	_____	_____
---------------------------	-------	-------

of the charge of Wire Fraud, as set forth in Count Two of the Indictment, as to an email from J.S. in the Northern District of California to S.C. on or about January 26, 2011 regarding "FW: autn\_boa."

**COUNT THREE: 18 U.S.C. § 1343 (Wire Fraud)**

We, the jury in the above-entitled case, unanimously find the defendant listed below:

	GUILTY	NOT GUILTY
--	--------	------------

MICHAEL RICHARD LYNCH	_____	_____
-----------------------	-------	-------

STEPHEN KEITH CHAMBERLAIN	_____	_____
---------------------------	-------	-------

of the charge of Wire Fraud, as set forth in Count Three of the Indictment, as to a press release titled "Autonomy Corporation plc Announces Results for the Year Ended December 31, 2010," distributed from Cambridge, England, to the Northern District of California on or about February 1, 2011.

**COUNT FOUR: 18 U.S.C. § 1343 (Wire Fraud)**

We, the jury in the above-entitled case, unanimously find the defendant listed below:

	GUILTY	NOT GUILTY
--	--------	------------

MICHAEL RICHARD LYNCH	_____	_____
-----------------------	-------	-------

STEPHEN KEITH CHAMBERLAIN	_____	_____
---------------------------	-------	-------

of the charge of Wire Fraud, as set forth in Count Four of the Indictment, as to a video conference involving participants in Palo Alto, California, and the United Kingdom on or about February 3, 2011.

**COUNT FIVE: 18 U.S.C. § 1343 (Wire Fraud)**

We, the jury in the above-entitled case, unanimously find the defendant listed below:

	GUILTY	NOT GUILTY
MICHAEL RICHARD LYNCH	_____	_____
STEPHEN KEITH CHAMBERLAIN	_____	_____

of the charge of Wire Fraud, as set forth in Count Five of the Indictment, as to a video conference involving participants in Palo Alto, California, and the United Kingdom on or about March 4, 2011.

**COUNT SIX: 18 U.S.C. § 1343 (Wire Fraud)**

We, the jury in the above-entitled case, unanimously find the defendant listed below:

	GUILTY	NOT GUILTY
MICHAEL RICHARD LYNCH	_____	_____
STEPHEN KEITH CHAMBERLAIN	_____	_____

of the charge of Wire Fraud, as set forth in Count Six of the Indictment, as to an email from M.H. to S.E. in the Northern District of California dated April 4, 2011 regarding "Prisa VAR."

**COUNT SEVEN: 18 U.S.C. § 1343 (Wire Fraud)**

We, the jury in the above-entitled case, unanimously find the defendant listed below:

	GUILTY	NOT GUILTY
MICHAEL RICHARD LYNCH	_____	_____
STEPHEN KEITH CHAMBERLAIN	_____	_____

of the charge of Wire Fraud, as set forth in Count Seven of the Indictment, as to a press release titled "Autonomy Corporation plc Trading Update for the Quarter Ended March 31, 2011," distributed from the United Kingdom to the Northern District of California on or about April 21, 2011.

**COUNT EIGHT: 18 U.S.C. § 1343 (Wire Fraud)**

We, the jury in the above-entitled case, unanimously find the defendant listed below:

GUILTY      NOT GUILTY

MICHAEL RICHARD LYNCH

\_\_\_\_\_

STEPHEN KEITH CHAMBERLAIN

\_\_\_\_\_

of the charge of Wire Fraud, as set forth in Count Eight of the Indictment, as to a press release titled “Autonomy Corporation plc Announces Interim Results for the Six Months Ended June 30, 2011,” distributed from the United Kingdom to the Northern District of California on or about July 27, 2011.

**COUNT NINE: 18 U.S.C. § 1343 (Wire Fraud)**

We, the jury in the above-entitled case, unanimously find the defendant listed below:

GUILTY      NOT GUILTY

MICHAEL RICHARD LYNCH

\_\_\_\_\_

STEPHEN KEITH CHAMBERLAIN

\_\_\_\_\_

of the charge of Wire Fraud, as set forth in Count Nine of the Indictment, as to a conference call to United States toll free number (866) 409-2889 by multiple numbers in the Northern District of California and United Kingdom on or about August 1, 2011.

**COUNT TEN: 18 U.S.C. § 1343 (Wire Fraud)**

We, the jury in the above-entitled case, unanimously find the defendant listed below:

GUILTY      NOT GUILTY

MICHAEL RICHARD LYNCH

\_\_\_\_\_

STEPHEN KEITH CHAMBERLAIN

\_\_\_\_\_

of the charge of Wire Fraud, as set forth in Count Ten of the Indictment, as to a conference call to United States toll free number (866) 409-2889 by multiple numbers in the Northern District of California and United Kingdom on or about August 2, 2011.

**COUNT ELEVEN: 18 U.S.C. § 1343 (Wire Fraud)**

We, the jury in the above-entitled case, unanimously find the defendant listed below:

GUILTY      NOT GUILTY

MICHAEL RICHARD LYNCH

\_\_\_\_\_

STEPHEN KEITH CHAMBERLAIN

\_\_\_\_\_

of the charge of Wire Fraud, as set forth in Count Eleven of the Indictment, as to a conference call to United States toll free number (866) 409-2889 by multiple numbers in the Northern District of California and United Kingdom on or about August 3, 2011.

**COUNT TWELVE: 18 U.S.C. § 1343 (Wire Fraud)**

We, the jury in the above-entitled case, unanimously find the defendant listed below:

GUILTY      NOT GUILTY

MICHAEL RICHARD LYNCH

\_\_\_\_\_

STEPHEN KEITH CHAMBERLAIN

\_\_\_\_\_

of the charge of Wire Fraud, as set forth in Count Twelve of the Indictment, as to a conference call to United States toll free number (866) 409-2889 by multiple numbers in the Northern District of California and United Kingdom on or about August 4, 2011.

**COUNT THIRTEEN: 18 U.S.C. § 1343 (Wire Fraud)**

We, the jury in the above-entitled case, unanimously find the defendant listed below:

GUILTY      NOT GUILTY

MICHAEL RICHARD LYNCH

\_\_\_\_\_

STEPHEN KEITH CHAMBERLAIN

\_\_\_\_\_

of the charge of Wire Fraud, as set forth in Count Thirteen of the Indictment, as to an email from A.H. in the United Kingdom to F.M. and others in the Northern District of California regarding "Project Daniel 1Room" attaching "Data Room Updates 509381013.4DOC" on or about August 4, 2011.

**COUNT FOURTEEN: 18 U.S.C. § 1343 (Wire Fraud)**

We, the jury in the above-entitled case, unanimously find the defendant listed below:

GUILTY      NOT GUILTY

MICHAEL RICHARD LYNCH

\_\_\_\_\_

STEPHEN KEITH CHAMBERLAIN

\_\_\_\_\_

of the charge of Wire Fraud, as set forth in Count Fourteen of the Indictment, as to an email from A.K. to M.S. and others in the Northern District of California regarding "RE: Tesla: Updated Legal DD Questions" on or about August 4, 2011.

**COUNT FIFTEEN: 18 U.S.C. § 1343 (Wire Fraud)**

We, the jury in the above-entitled case, unanimously find the defendant listed below:

GUILTY      NOT GUILTY

MICHAEL RICHARD LYNCH

\_\_\_\_\_

STEPHEN KEITH CHAMBERLAIN

\_\_\_\_\_

of the charge of Wire Fraud, as set forth in Count Fifteen of the Indictment, as to an emailed letter from Capita Registrars in the United Kingdom to M.S. and A.J. in the Northern District of California, requesting payments of £5,445,493,678.35 and £24,065,825.50.

**COUNT SIXTEEN: 18 U.S.C. § 1348 (Securities Fraud)**

We, the jury in the above-entitled case, unanimously find the defendant Michael Richard Lynch

\_\_\_\_\_ (GUILTY/NOT GUILTY)

of the charge of Securities Fraud, as set forth in Count Sixteen of the Indictment.

DATED: \_\_\_\_\_

\_\_\_\_\_  
FOREPERSON